

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF ILLINOIS EASTERN DIVISION**

CENTRAL STATES, SOUTHEAST AND )  
SOUTHWEST AREAS PENSION FUND, )  
and, HOWARD McDougall, trustee, )  
  )  
  )    Case Nos. 07C 6348  
Plaintiffs, )  
  )  
  )    Hon. William T. Hart  
vs. )  
  )  
  )    Magistrate Judge Schenkier  
CENTRA, INC. and THE DETROIT )  
INTERNATIONAL BRIDGE COMPANY, )  
  )  
Defendants. )

**PLAINTIFFS' MOTION FOR LEAVE TO FILE ADDITIONAL  
APPEARANCES PURSUANT TO LOCAL RULE 83.17**

NOW COME Plaintiffs Central States Southeast and Southwest Areas Pension Fund (“Central States”) and Howard McDougall, by and through its counsel Sonnenschein, Nath & Rosenthal LLP, and in support of their Motion for Leave to File Additional Appearances Pursuant to Local Rule 83.17, state as follows:

1. On November 8, 2007, Central States and Howard McDougall (“Plaintiffs”) filed this lawsuit against CenTra, Inc. (“Centra”) and The Detroit International Bridge Company (“DIBC”) (collectively, “Defendants”) seeking to vacate or modify an opinion entered pursuant to Section 4221 of the Employee Retirement Income Security Act of 1974 (“ERISA”), as amended by the Multiemployer Pension Plan Amendments Act of 1980 (“MPPAA”), 29 U.S.C. §§ 1401.

2. On or about November 9, 2007, Plaintiffs retained the law firm of Sonnenschein, Nath & Rosenthal LLP to represent Plaintiffs in this matter. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are currently attorneys licensed to practice in Illinois.

3. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are attorneys admitted to the General Bar of the United States District Court for the Northern District of Illinois. Further, Richard L. Fenton is an attorney admitted to the Trial Bar of the United States District Court for the Northern District of Illinois.

4. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are currently in good standing throughout Illinois and before the District Court for the Northern District of Illinois.

5. Draft appearances for Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are attached hereto as Exhibit "A."

WHEREFORE, Plaintiffs Central States Southeast and Southwest Areas Pension Fund and Howard McDougall respectfully request that this Honorable Court grant this motion, thus permitting Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo to file their appearances, and for such other and further relief as this Court deems just and appropriate under the evidence and circumstances.

Dated: January 17, 2008

Respectfully submitted,

By: /s/ Richard L. Fenton  
One of the Attorneys for Defendant/Counter-Plaintiff  
Central States Southeast and Southwest Areas Pension  
Fund

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing **Notice of Motion** and **Plaintiffs' Motion for Leave to File Additional Appearances Pursuant to Local Rule 83.17** was filed electronically with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, this 17th day of January, 2008, using the CM/ECF system, which sent email notification of that filing to all parties listed below:

<p>James Patrick Condon Thomas Maurice Weithers Central States Law Department 9377 W. Higgins Road 10th Floor Rosemont, IL 60018-5123 <i>jcondon@centralstatesfunds.org</i> <i>tweithers@centralstates.org</i></p> <p>Attorneys for Defendants/Counter-Plaintiff Central States Southeast and Southwest Areas Pension Fund</p>	
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By: /s/ Geoffrey J. Repo  
One of the Attorneys for Plaintiffs Central States  
Southeast and Southwest Areas Pension Fund and  
Howard McDougall